



Monday, September 8, 2020

VIA ECF and facsimile to (212) 805-7942

Honorable Alvin K. Hellerstein, U.S. District Court Judge
United States District Court, Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

So ordered. Plaintiff's opposition to Defendant's motion to compel arbitration shall be due on September 30, 2020, and Defendant's reply shall be due on October 16, 2020.

/s/ Alvin K. Hellerstein
9/9/2020

RE: Shanell Moore v. ABM Industries, Inc., et al.
Civ. No. 1:20-cv-2962

Dear Judge Hellerstein:

We represent Plaintiff, Shanell Moore, in the above-referenced action. I write in accordance with Your Honor's Individual Rule 1. D. to request a three-week extension of the date to submit opposition papers in response to Defendant ABM's (hereinafter referred to as "Defendant") motion to compel arbitration/stay the action (*See* Dkt. ## 19-22). This request would push back the date to file and serve papers in opposition Defendant's motion from Wednesday, Sept. 8, 2020 to Wednesday, Sept. 30, 2020.

This is the first such request by Plaintiff for an extension to respond to this motion. The on-going operational disruption caused by the COVID-19 outbreak has prevented Plaintiff's counsel from being able to confer in-person with Plaintiff to review all email correspondence highly likely to be dispositive of Defendants' claims in their currently pending motion. This requested extension will allow Plaintiff the necessary time to schedule an in-person meeting with our client to review all documentation and email correspondence in order to effectively rebut and oppose the assertions made in Defendant's motion.

Defendant consents to this request provided they would be allowed two-weeks to reply to Plaintiff's opposition to the motion because of upcoming Jewish holidays. Plaintiff agrees to this condition. Accordingly, the due date for filing Defendant's Reply would be Wednesday, Oct. 16, 2020.

Thank you for your consideration in this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Seamus P. Barrett', with a stylized flourish at the end.

Seamus P. Barrett, Esq.
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